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HEARING DATE: 2/4/2022 AT 10:00 AM

*Proposed Counsel to the Debtors
and Debtors in Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

JPA NO. 111 CO., LTD. and
JPA NO. 49 CO., LTD.,

Debtors.¹

Chapter 11

Case No.: 21-12075 (DSJ)

(Jointly Administered)

**NOTICE OF FILING OF REVISED SCHEDULE OF IMPORTANT
DATES/DEADLINES IN CONNECTION WITH SALES PROCESS**

PLEASE TAKE NOTICE that on December 31, 2021, the above-captioned debtors and debtors-in-possession (the “Debtors”) filed the *Debtors’ Application for Entry of Entry of Orders: (I)(A) Approving Bidding Procedures Relating to the Sale of Substantially all of the Debtors’ Assets; (B) Establishing Stalking Horse Bidders and Bid Protections; (C) Approving Procedures of the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; (D) Authorizing Enforcement Actions; (E) Scheduling an Auction and a Sale Hearing; and (F) Approving the Form and Manner of Notice Thereof; and (II)(A) Approving the Sale of the Purchased Assets Free and Clear of all Liens, Claims, Interests and Encumbrances; and (B) Granting Related Relief* [Docket No.

¹ The Debtors in these Chapter 11 cases are: JPA No. 111 Co., Ltd. and JPA No. 49 Co., Ltd. The Debtors’ corporate address is Kasumigaseki Common Gate West Tower, 3-2-1 Kasumigaseki, Chiyoda-Ku, Tokyo 100-0013.

21] (the “Bid Procedures and Sale Motion”).²

PLEASE TAKE FURTHER NOTICE that the Debtors hereby file a Revised Scheduled of Important Dates /Deadlines in Connection with the Sale Process (the “Revised Schedule”) with a redline included to show the changes to the Schedule that has been amended, modified, or supplemented since filed with the Bid Procedures and Sale Motion:

Exhibit 1: Revised Schedule

Exhibit 2: Redline of Revised Schedule

PLEASE TAKE FURTHER NOTICE that copies of the Bid Procedures and Sale Motion, the Exhibits, and the Revised Schedule can be viewed and/or obtained by (i) accessing the Bankruptcy Court’s Website for a fee, or by (ii) contacting the Office of the Clerk of the United States Bankruptcy Court, Southern District of New York. Please note that a PACER password is required to access documents on the Bankruptcy Court’s Website.

Dated: New York, New York
February 4, 2022

JPA NO. 111 CO., LTD. and
JPA NO. 49 CO., LTD.
Debtors and Debtors in Possession
By their Proposed Counsel
TOGUT, SEGAL & SEGAL LLP
By:

/s/ Kyle J. Ortiz
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² Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in the Bid Procedures and Sale Motion.

EXHIBIT "1"

Updated for February 4, 2022 Hearing

SUMMARY OF IMPORTANT DATES

Key Event	Deadline ¹
Continued Hearing on Bidding Procedures	February 4, 2022
Assumed Date by which Bidding Procedures Order Entered	February 4, 2022
Deadline for Bidders Who Are Secured Creditors to Complete Request to Utilize Credit Bids at the Auction	February 10, 2022 at 4:00 p.m. (ET)
Deadline for Any Objections to Credit Bidding under Bankruptcy Code Section 363(k) (the " <i>Credit Bidding Objection Deadline</i> ")	February 17, 2022 at 4 p.m. (ET)
Deadline to Submit any Objections to Sale Based upon the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' <i>Statement Responding to this Court's Inquiries Regarding the Debtors' Motion to Approve Bidding Procedures</i> , dated January 28, 2022 [Docket No. 90] (the "Debtors' Statement")) and the General Sale Terms	February 17, 2022 at 4 p.m. (ET)
Deadline for any Responses in Support of Credit Bidding (the " <i>Credit Bidding Response Deadline</i> ")	February 23, 2022 at 4 p.m. (ET)
Deadline to Submit any Replies to the Objections to Sale Based upon the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' Statement) and the General Sale Terms	February 23, 2022 at 4 p.m. (ET)
Deadline for any Replies in Further Support of Objections to Credit Bidding (the " <i>Credit Bidding Reply Deadline</i> ")	March 1, 2022 at 4 p.m. (ET)

¹ Because the Court rescheduled the conclusion of the Bidding Procedures Hearing from the originally anticipated January 20, 2022 to February 4, 2022, the sale process dates have been adjusted. The following dates assume (a) the Bidding Procedures Hearing will be completed on February 4, 2022, (b) the entry of the order approving bidding procedures by February 5, 2022, and (c) a sale hearing on March 14, 2022. Dates may be further adjusted (subject to consent of Stalking Horse Bidder (not to be unreasonably withheld)) if hearings are scheduled for different dates or if either or both of Bidding Procedures Order or the Sale Order are entered on different date(s).

Court Hearing Date for Any Credit Bidding Disputes	[**Subject to Court Availability**][March 4, 2022 at __:__ .m.]
Deadline to Submit Bids (the Bid Deadline)	March 7, 2022 at 12 noon (ET) (assumes entry of Bidding Procedures Order by February 5th)
Deadline for Debtors to Notify Bidders of Status as Qualified Bidders (the Qualified Bid Deadline)	March 7, 2022 at 6 p.m. (ET)
If No Auction Is to Be Held, Deadline for Debtors to Notice that Stalking Horse Bid (as defined herein) Is Successful Bid	March 7, 2022 at 6 p.m. (ET)
Auction to be held if the Debtors receive Qualified Bids, to be conducted via Zoom Telephone Conference	March 8, 2022 at 10 a.m. (ET)
Deadline to File Notice of (i) Identities of Successful Bid and Back-Up Bid and (ii) for seeking authority to sell the Purchased Assets to such Successful Bidder	March 8, 2022 at 10:00 p.m. (ET)
Deadline to Object to Successful Bid (Objections Limited to Identity of Successful Bidder and to any Deviations from the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' <i>Statement Responding to this Court's Inquiries Regarding the Debtors' Motion to Approve Bidding Procedures</i>, dated January 28, 2022 [Docket No. 90] (the "Debtors' Statement"))	March 10 2022 at noon (ET)
Deadline for Replies in Support of Sale	March 11 2022 at 11:59 p.m. (ET)
Sale Hearing	[**Subject to Court Availability**][March 14, 2022 at [__:_0_ .m. (ET)
Assumed date by which Sale Order is entered	March 14, 2022
Deadline for Closing of Successful Bid	March 15, 2022 at 5:00 p.m. (ET) (or Such Later Date as Reasonably Agreed by the Debtors and the Successful Bidder)

EXHIBIT "2"

Updated for February 4, 2022 Hearing

SUMMARY OF IMPORTANT DATES

Key Event	Deadline ¹
<u>Continued</u> Hearing on Bidding Procedures	January 20 <u>February 4</u> , 2022
Assumed Date by which Bidding Procedures Order Entered	January 22 <u>February 4</u> , 2022
Deadline for Bidders Who Are Secured Creditors to Complete Request to Utilize Credit Bids at the Auction	January 28 <u>February 10</u> , 2022 at 4:00 p.m. (ET)
Deadline for Any Objections to Credit Bidding under Bankruptcy Code Section 363(k) (the " <i>Credit Bidding Objection Deadline</i> ")	February 4 <u>17</u> , 2022 at 4 p.m. (ET)
<u>Deadline to Submit any Objections to Sale Based upon the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' Statement Responding to this Court's Inquiries Regarding the Debtors' Motion to Approve Bidding Procedures, dated January 28, 2022 [Docket No. 90] (the "Debtors' Statement")) and the General Sale Terms</u>	<u>February 17, 2022 at 4 p.m. (ET)</u>
Deadline for any Responses in Support of Credit Bidding (the " <i>Credit Bidding Response Deadline</i> ")	February 11 <u>23</u> , 2022 at 4 p.m. (ET)
<u>Deadline to Submit any Replies to the Objections to Sale Based upon the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' Statement) and the General Sale Terms</u>	<u>February 23, 2022 at 4 p.m. (ET)</u>
Deadline for any Replies in Further Support of Objections to Credit Bidding (the " <i>Credit Bidding Reply Deadline</i> ")	February 14 <u>March 1</u> , 2022 at 4 p.m. (ET)

¹ ~~These dates assume a January 20, 2022~~ Because the Court rescheduled the conclusion of the Bidding Procedures Hearing from the originally anticipated January 20, 2022 to February 4, 2022, the sale process dates have been adjusted. The following dates assume (a) the Bidding Procedures Hearing will be completed on ~~the Bidding Procedures~~ February 4, 2022, (b) the entry of the order approving bidding procedures by February 5, 2022, and (c) a ~~February 25, 2021 Sale Hearing~~ sale hearing on March 14, 2022. Dates ~~to may~~ be further adjusted (subject to consent of Stalking Horse Bidder (not to be unreasonably withheld)) if hearings are scheduled for different dates or if either or both of Bidding Procedures Order or the Sale Order are entered on different date(s).

Updated for February 4, 2022 Hearing

Court Hearing Date for Any Credit Bidding Disputes	[**Subject to Court Availability**][February 16 <u>March 4</u> , 2022 at __: __.m.]
Deadline to Submit Bids (the Bid Deadline)	February 22, 2022 at 10 a.m. (ET) <u>March 7, 2022 at 12 noon (ET) (assumes entry of Bidding Procedures Order by February 5th)</u>
Deadline for Debtors to Notify Bidders of Status as Qualified Bidders (the Qualified Bid Deadline)	February 22 <u>March 7</u> , 2022 at 5:00 <u>6</u> p.m. (ET)
If No Auction Is to Be Held, Deadline for Debtors to Notice that Stalking Horse Bid (as defined herein) Is Successful Bid	February 22 <u>March 7</u> , 2022 at 5:00 <u>6</u> p.m. (ET)
Auction to be held if the Debtors receive Qualified Bids, to be conducted via Zoom Telephone Conference	February 23 <u>March 8</u> , 2022 at 10 a.m. (ET)
Deadline to File Notice of (i) Identities of Successful Bid and Back-Up Bid and (ii) for seeking authority to sell the Purchased Assets to such Successful Bidder	February 23 <u>March 8</u> , 2022 at 6:00 <u>10:00</u> p.m. (ET)
Deadline to Object to Successful Bid (<u>Objections Limited to Identity of Successful Bidder and to any Deviations from the Terms of the Stalking Horse Purchase Agreement (as modified by Debtors' Statement Responding to this Court's Inquiries Regarding the Debtors' Motion to Approve Bidding Procedures, dated January 28, 2022 [Docket No. 90] (the "Debtors' Statement")</u>)	February 24, 2022 <u>March 10 2022</u> at 10:00 a.m. <u>noon</u> (ET)
Deadline for Replies in Support of Sale	February 24, 2022 <u>March 11 2022</u> at 6:00 <u>11:59</u> p.m. (ET)
Sale Hearing	[**Subject to Court Availability**][February 25 <u>March 14</u> , 2022 at [__:___.m. (ET)]
<u>Assumed date by which Sale Order is entered</u>	<u>March 14, 2022</u>
Deadline for Closing of Successful Bid	February 28 <u>March 15</u> , 2022 at 5:00 p.m. (ET) (or Such Later Date as <u>Reasonably</u> Agreed by the Debtors and the Successful Bidder)